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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

14 THIS DOCUMENT RELATES TO:
15 ALL ACTIONS
16
17
18

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

**OMNIBUS SEALING STIPULATION
REGARDING DKT. NOS. 1540 AND
1542**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

19 Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective
20 Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting
21 Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively,
22 "YouTube") and Plaintiffs (collectively, the "Parties") submit this Omnibus Sealing Stipulation
23 in connection with the Parties' Joint Letter Brief re Certain Noncustodial YouTube Databases
24 (ECF No. 1540) and Joint Letter Brief re RFP Nos. 37 and 50 (Account Sign Up and
25 Cancellation Interfaces) (ECF No. 1542).

26 At this time, Plaintiffs do not oppose the sealing request and reserve all rights to
27 challenge designations and sealing in the future. Accordingly, the Parties stipulate to the
28 following chart.

**I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR
PROVISIONAL REDACTIONS**

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
1540-1	Joint Letter Brief re Certain Noncustodial YouTube Databases	Maintain redactions at 1–4	Good cause exists to seal sensitive and confidential information about YouTube’s platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou (“Chiou Decl.”) at 2.	A party has not previously sought to seal the same information.
1540-2	Exhibit A	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube’s platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube’s business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Chiou Decl. at 2.	A party has not previously sought to seal the same information.

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
1542-1	Joint Letter Brief re RFP Nos. 37 and 50 (Account Sign Up and Cancellation Interfaces)	Maintain redactions at 2, 4	Good cause exists to seal sensitive and confidential information about YouTube's platform design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Chiou Decl. at 2.	A party has not previously sought to seal the same information.

IT IS SO STIPULATED AND AGREED.

Respectfully submitted,

DATED: January 29, 2025

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Professional Corporation

By: /s/ Christopher Chiou

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ATTESTATION

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: January 29, 2025

By: /s/ Christopher Chiou

Christopher Chiou